

Message

From: Rumrill, Nancy [Rumrill.Nancy@epa.gov]
Sent: 7/12/2019 12:04:17 AM
To: Dan Johnson [DanJohnson@florencecopper.com]
CC: Albright, David [Albright.David@epa.gov]
Subject: Additional comments on the M57R Completion Report

Hi Dan,

Please address the following comments on the Florence Copper PTF M57R-O Well Completion Report and associated attachments:

1.B(10) Bottom hole pressure: Was the bottom hole pressure measured at depth and at what depth, or was it based on a calculation? *FCI should provide a more complete description of the basis for the reported bottom hole pressure of 430 psi.*

VI. As-Built Well Diagram: The well diagram, labeled Figure 2, shows the top of the Bedrock Oxide Unit at 485 feet, which is inconsistent with the top reported in the lithology log at 460 feet and indicated by the geophysical logs at approximately 440 feet. The depths of the pressure transducer and low-flow pump are also omitted from the diagram. The well was constructed in accordance with permit conditions, as depicted in Figure 2, and the diagram is acceptable except for those discrepancies and the lack of a description of centralizer placement in the wellbore annulus. *FCI should clarify and correct the inconsistency in the depth to the top of the Bedrock Oxide Unit and add the depths of the transducer and low-flow pump and a description of centralizer placement to the diagram.*

VII. Demonstrations of Mechanical Integrity: M57R-O failed the standard annular pressure test (SAPT). Based on our discussion on 7/11/2019 of this issue, FC will retest and report on the results. *Provide us with the proposed date of retesting.*

Part II.E.3.ii(B) of the permit requires a temperature log of the well for evaluation of Part II mechanical integrity. *FCI should schedule and perform a temperature survey of the well in accordance with permit conditions.*

XII. Well Completion: The well video survey is not provided in Appendix I, as stated in the report, and there is no Appendix I in the report. *FCI should provide a copy of the video log report.*

If you have any questions, please let me know.

Thanks, Nancy

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